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February 22, 2016

Kaitlin Seufert  
Report Analysis Division  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

Identification Number: C00571372

Reference: 48-HOUR NOTIFICATION REPORT, FILED 12/23/2015

Dear Ms. Seufert:

This response pertains to the Reports Analysis Division's ("RAD") Request for Additional Information ("RAI") dated January 18, 2016, concerning Right to Rise USA's ("RTR") 48-Hour Independent Expenditure Report filed on December 23, 2015. In the RAI, RAD requests that RTR "amend the 48-Hour Report by providing the state" for national cable independent expenditures made on December 21, 2015. These were expenditures for national cable media production on the Fox News network that were not specific to any state. Unlike broadcast media made on a local-affiliate basis, these ads were aired to every Fox News cable subscriber nationwide. A combination of differing pricing models and the fact of national airing makes it impossible to itemize such costs on a per-state basis. We urge the Commission to provide clarity to groups participating in the 2016 Presidential primary elections and adopt a reasonable interpretive rule governing these types of national advertisements.

Please feel free to contact me if you have any additional questions concerning this matter.

Sincerely,

Charles R. Spies  
Treasurer

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